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**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF ARIZONA**

In Re Bard IVC Filters Products  
Liability Litigation

No. MD-15-02641-PHX-DGC

**JOINT SUPPLEMENT TO THE  
PARTIES' PROPOSED AGENDA AND  
DISCUSSION OF ISSUES SUBMITTED  
PURSUANT TO THE COURT'S  
SEPTEMBER 15, 2015 ORDER SETTING  
INITIAL CASE MANAGEMENT  
CONFERENCE**

The parties provide this supplement to their Proposed Agenda and Discussion of Issues Submitted Pursuant to the Court's September 15, 2015 Order Setting Initial Case Management Conference to inform the Court that they will not be filing a proposed ESI protocol or Rule 502 Order in advance of the October 29, 2015 Case Management Conference. Due to formation issues for the proposed Plaintiffs Steering Committee and assigning committee responsibilities, plaintiffs' counsel was not able to address the ESI

1 issues until this week. Nonetheless, the parties have been and are working cooperatively to  
2 produce agreed forms of those orders and will be prepared to answer any questions the Court  
3 may have regarding those matters at the Case Management Conference.

4 RESPECTFULLY SUBMITTED this 28th day of October, 2015.

5 **GALLAGHER & KENNEDY, P.A.**

6 By: /s/ Paul L. Stoller  
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1 I hereby certify that on this 28th day of October, 2015, I electronically transmitted the  
2 attached document to the Clerk's Office using the CM/ECF System for filing and transmittal  
3 of a Notice of Electronic Filing.

4 /s/ Gay Blakesley

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